

Exhibit 16

E-Mail from Plaintiff Counsel to Defense Counsel of 7/1/19

**From:** Miles Greengard mgreengard@powersgreengard.com  
**Subject:** Rule 26(f) Conference re; Werking v Werking  
**Date:** July 1, 2019 at 2:43 PM  
**To:** Anne VanderBroek anne@vanderbroeklaw.com

MG

Anne:

Just wanted to touch base on this again. When we had discussed this in May, you stated you wanted to wait for a ruling on your 12(b)(6) motion. I know that we're still waiting for a ruling on your motion; but given that we haven't received a ruling yet, we could ostensibly be waiting for months.

Have you reconsidered your position? I'm of the mindset that we may as well get the ball rolling - I don't anticipate significant discovery outside of depositions of the three principals.

Let me know.

Thanks in advance.

Sincerely,

Miles Greengard  
Attorney

Powers & Greengard  
The Carriage House  
509 Franklin  
Grand Haven, MI 49417  
[powersgreengard.com](http://powersgreengard.com)  
Office: (616) 512-5474  
Fax: (616) 743-5917  
Mobile: (616) 350-8760